

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE ELECTRONIC BOOKS ANTITRUST LITIGATION)))	No. 11-md-02293 (DLC) ECF Case
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This Document Relates to:

THE STATE OF TEXAS, et al.,)	
)	
Plaintiffs,)	
)	Civil Action
v.)	No.12-cv-3394
)	
PENGUIN GROUP (USA) INC., et al.,)	
)	
Defendants.)	
)	
)	

**JOINT MOTION FOR CONFIDENTIALITY ORDER RELATED TO
INFORMATION PROVIDED UNDER ORDER AND STIPULATED INJUNCTION**

PLEASE TAKE NOTICE that Liaison Counsel for Plaintiff States and Defendants Penguin Group (USA) Inc. and Holtzbrinck Publishers, LLC, d/b/a Macmillan and Verlagsgruppe Georg von Holtzbrinck GmbH ("Settling Defendants") respectfully submit this joint motion requesting an Order protecting the confidentiality of all information and documents provided by Settling Defendants pursuant to the Order and Stipulated Injunction in this case.

On November 21, 2013, Liaison Counsel for the Plaintiff States submitted a Motion for

Final Approval of Macmillan and Penguin Settlements and Distribution Plan. Should the Court approve those settlements and enter the Orders and Stipulated Injunctions submitted therewith, the Settling Defendants will, among other things, be required to produce confidential and proprietary information and documents to the Plaintiff States on an ongoing basis. Liaison Counsel for Plaintiff States and Settling Defendants wish to maintain the confidentiality of these documents once they are produced. Therefore, they are jointly requesting an Order that all such documents and information will not be provided to anyone who is not an authorized representative of the Attorney General of a Plaintiff State.

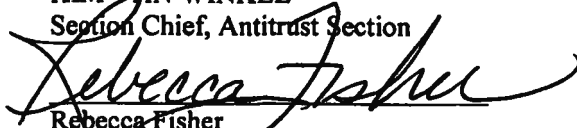
Dated: ~~December~~ ~~November~~ 2, 2013.

Respectfully submitted,

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Joint Motion for Confidentiality

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